

CITY OF OAKLAND



ELECTRICAL SERVICES
Public Works Agency

• 7101 EDGEWATER DRIVE, BUILDING NO. 2 •

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FAX LETTER

Mignon Marks
California Energy Commission

Re: Comments for the May 22, 2002 Hearing on Distributed Generation

Dear Mignon,

I am unable to travel to Sacramento to attend today's hearing on the Distributed Generation Strategic Plan. However, the City of Oakland is in the midst of writing an energy policy that will hopefully include positions on distributed generation in Oakland. Therefore, I would like to offer the following comments from a staff perspective:

1. Distributed generation for all life-cycle cost effective renewable sources should be enthusiastically supported.
2. There should not be any net air emissions increase from fossil-fueled distributed generation in areas with air quality issues. In Oakland, we already face serious air pollution-related health problems on behalf of the rest of the state as a transportation hub.
 - A. In cases where cogeneration is occurring, the incremental amount of additional emissions should be zero. For example, if a cogeneration system replaces natural gas fired boiler producing 100 tons of harmful air emissions per month, the cogeneration system should not produce more than 100 tons of harmful air emissions per month. Whether or not this limitation should be specific to each air pollutant -- rather than implicitly allowing interpollutant substitutions -- requires further consideration. Clearly, not all pollutants pose the same risks on a per ton basis.
 - B. Fossil fueled distributed generation should not be allowed in areas with health problems due to air emissions; unless localized emission reductions will fully offset the increase of any pollutant from the new equipment.
3. Wheeling of renewable generation should be enthusiastically supported, including the creation of reasonable tariffs (in collaboration with the CPUC) for cross-town wheeling. Reasonable interconnection tariffs and policies should also be enthusiastically supported.
4. Direct access for renewable generation should be enthusiastically supported. This is a special case of direct access that will be clearly in the public interest. Certainly, direct access customer should not be excused from covering a reasonable share of the debt from the electricity crisis. This can be readily achieved through continuing surcharges.
5. Local land use policies may have a role in the siting of distributed generation facilities. That role should be preserved.

Thanks you for considering these comments. I regret that I will not be attending and would like to receive a copy of the minutes (or report) and other results of today's hearing. I can be reached at (510) 615-5421 for follow up.

Sincerely,

Scott Wentworth
Energy Engineer